

State of Wisconsin
Government Accountability Board

Laura Manriquez,
Complainant,

Against

JoCasta Zamarripa, Candidate
Respondent.

AFFIDAVIT & RESPONSE TO NOMINATION PAPER CHALLENGE by
JOEL GRATZ on behalf of JOCASTA ZAMARRIPA

I, Joel Gratz, based on information and belief, hereby state as follows:

1. This affidavit is in response to a purported challenge filed by Laura Manriquez, a candidate for State Assembly, as to the sufficiency of nomination papers to place JoCasta Zamarripa on the ballot for State Assembly in the 8th Assembly District.
2. I am a qualified elector in and resident of the State of Wisconsin. I am the Executive Director of the Assembly Democratic Campaign Committee (ADCC), 110 King Street, Suite 203, Madison, WI 53073. I am filing this response on behalf of Representative Zamarripa.
3. Complainant Manriques makes allegations of insufficient nomination signatures for Representative Zamarripa which approach being frivolous, barely warranting the Board's time and should be dismissed in their entirety given past Board decisions.
4. On or about May 28, 2014, Respondent filed nomination papers with the Government Accountability Board (GAB) to be placed on the November 4, 2014 ballot for State Representative in the 8th Assembly District. The Respondent submitted 307 signatures that Board staff quickly and easily counted and determined were sufficient.

5. On or about June 6th, potential candidate Laura Manriquez attempted to file a challenge to Representative Zamarripa's nomination papers. There are serious doubts as to the timeliness of this filing.
6. On the afternoon of June 6, 2014, nearly 24 hours after the deadline for filing challenges to nomination papers, the Assembly Democratic Campaign Committee (ADCC) received an email from GAB Staff that Ms. Manriquez was challenging Representative Zamarripa's nomination papers. This email contained just a single document, a table describing certain entries on nomination papers, along with an explanation that there was confusion in advising Ms. Manriquez how to file a verified complaint. The email did not provide a verified complaint but suggested it may be forthcoming via US Mail.
7. Ms. Manriquez challenge should be rejected as not timely because:
 - a. To date, Monday, June 9th at 3:30p.m. no copy of a verified complaint has even been received or made available to review;
 - b. The deadline and process for challenges is clear, well documented in GAB materials and the ultimate responsibility for the challenger to know and comply with;
 - c. The challenger could have made other efforts to provide at least copies of all documents regarding their challenge to respondent, but has failed to do so; and
 - d. While a reader may try to infer the subject of the challenge from the single document provided, lacking a complete verified complaint, it is impossible to fully respond to the challenge which is precisely a reason why there are strict deadlines and procedures to be followed, including the timely filing of a verified complaint.
8. Regardless of the timeliness of the Manriquez filing, on it's face the complaint fails on it's face to challenge sufficient signatures to remove Representative Zamarripa from the ballot. Representative Zamarripa filed and had counted by GAB staff 307 signatures. She filed an additional 77 supplemental signatures, for a total count of 384 signatures. Manriquez appears to have attempted to challenge 143 signatures.

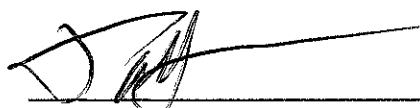
Even if every challenge was successful, which would be a major assumption, Representative Zamarripa would have sufficient signatures for ballot status.

9. Exhibit "A", attached, provides direct response to sufficient numbers of the challenged signatures to ensure ballot status even if the supplemental signatures were not to be counted for Representative Zamarripa. The vast majority of these fall into two categories: claims of missing street types and a gross attempt to in accurately read the written information to claim the address doesn't exist. I virtually all cases the addresses are easily discernable.
10. Complaint fails to sufficiently challenge enough signatures as in valid to disqualify Representative JoCasta Zamarripa as a candidate for State Assembly, 8th Assembly District and Respondent should be found eligible for placement on the ballot for State Assembly Representative.

I, Joel Gratz, being dually sworn upon oath, state that I personally read the above complaint and that the above listed allegations and true and correct based upon my personal knowledge and my review of the nomination papers and other public records, and as to those allegations stated on my information and believe, I believe them to be true.

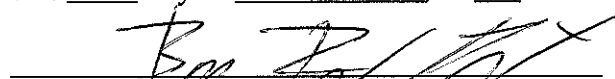
Dated this 9 day of June, 2014.

Respectfully submitted,


Joel Gratz

Subscribed and sworn to before me

this 9th day of June, 2014.


(signature of person authorized to administer oaths)

My commission expires 11/31/2016 or is permanent ☐
Notary Public ☒, or _____

Exhibit "A"
Response to specific signature challenges.

Item #	Page	Line #	Problem Observed	Facts
1	1	1	Incomplete address – street type missing	Provides address info. No other type than Street for Washington in Milwaukee.
2	1	2	doesn't reflect actual residence - no such street name of WeswashingtonStreet!	Misread. Clearly W. Washington St.
3	1	3	Incomplete address – street type missing	Provides address info. No other type than Street for Washington in Milwaukee.
4	1	4	Incomplete address – street type missing	Provides address info. No other type than Street for Washington in Milwaukee.
5	1	5	Incomplete address – street type missing	Provides address info. No other type than Street for Washington in Milwaukee.
6	1	6	Incomplete address – street type missing	Provides address info. No other type than Street for Washington in Milwaukee.
7	1	7	doesn't reflect actual residence - no such street address of 931 53rs ct	931 53 rd Street
8	2	6	Incomplete address – street type missing	Water Street
9	2	7	doesn't reflect actual residence - no such street address of 911 so. 9stx	911 S. 4 th Street
10	3	7	Incomplete address – street type missing	National Ave.
11	3	8	Incomplete address – street type missing	National Ave.
12	4	1	Incomplete address – street type missing	6 th Street
13	4	2	Incomplete address – street type missing	7 th Street.
14	4	3	Incomplete address – street type missing	7 th Street
15	4	4	Incomplete address – street type missing	7 th Street
16	4	5	Incomplete address – street type missing	7 th Street
17	4	7	doesn't reflect actual residence - no such street address of 2340 58 th st.	S 8 th Street.
18	5	1	doesn't reflect actual residence - no such street address of 1021 w ucelkerSt	Grant. Illegible

19	7	2	doesn't reflect actual residence - no such street address of 714 South 2NStreet	S. 2 nd Street
20	7	3	doesn't reflect actual residence - no such street address of 412 S. 4R St	S 4 th Street
21	8	1	Incomplete address – street type missing	Orchard St.
22	8	3	Incomplete address – street type missing	Orchard St.
23	9	1	Incomplete address – street type missing	24 th Street
24	9	3	Incomplete address – street type missing	Merrill Street

Item #	Page	Line #	Problem Observed	Facts
25	9	4	Incomplete address – street type missing	Merrill St.
26	10	3	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1939 S. 284n	S. 20 th St.
27	11	1	incomplete address - street type missing & doesn't reflect actual residence of 1113 S. 1205	S 12 th St
28	11	2	Incomplete address – street type missing	Scott St.
29	11	4	doesn't reflect actual residence of 131qs. 72ns st.	1319 S. 22 nd St
30	11	6	doesn't reflect actual residence of 2669 1.16m ct	2669 S 16 th St.
31	12	1	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 921 west Lapham Apt	Bldv.
32	12	2	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 921 west Lapham Apt	Lapham Blvd.
33	12	3	Incomplete address – street type missing	Lapham Blvd.
34	12	5	Incomplete address – street type missing	Lapham Blvd
35	12	6	Incomplete address – street type missing	Lapham Blvd
36	13	2	doesn't reflect actual residence - no such street address of 1009 sur delals st	Grant. Illegible.
37	13	3	Incomplete address – street type missing	Forest Home Ave.
38	13	4	Incomplete address – street type missing	Street
39	13	6	incomplete address - street type	Greenfield Ave.

			missing & doesn't reflect actual residence - no such street address of 1224 W. Greenfield	
40	13	7	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1022 W. Greenfield	Greenfield Ave.
41	13	8	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1099 W. 6yreenfield	Greenfield Ave
42	13	9	Incomplete address – street type missing	Greenfield Ave.
43	13	10	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1437 S10	S. 10 th St
44	14	5	doesn't reflect actual residence - no such street address of 1544 S80 St	S. 10 th Street
45	14	8	doesn't reflect actual residence - no such street address of 156510st	S. 10 th Street
46	14	9	doesn't reflect actual residence - no such street address of 156510st	S 10 th Street
47	15	1	Incomplete address – street type missing	Ave is present
48	16	2	doesn't reflect actual residence - no such street address of 15095 22 St	S 22 nd St
49	16	3	doesn't reflect actual residence - no such street address of 1728 524St	S 24 th St
50	16	6	Incomplete address – street type missing	S 25 th St
51	16	8	doesn't reflect actual residence - no such street address of 2234A 528Mf.	S. 25 th St.
52	16	10	Incomplete address – street type missing	Grant Street
53	17	2	doesn't reflect actual residence - no such street address of 14275 7 th st	S 7 th St
54	17	3	doesn't reflect actual residence - no such street address of 14315 7 th st	S. 7 th Street
55	17	4	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 14315 th	Grant St
56	17	5	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 14315 th	Grant St.
57	17	6	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1431 st 7 th	S 7 th St
58	17	7	Incomplete address – street type	S. 7 th St.

			missing	
59	17	8	Incomplete address – street type missing	S 7 th St.
60	17	9	Incomplete address – street type missing	S 7 th St
61	17	10	Incomplete address – street type missing	S 7 th St
62	18	4	doesn't reflect actual residence - no such street of 1527 510 th St	S 10 th St
63	18	5	doesn't reflect actual residence - no such street of 1535 510 th St	S 10 th St.
64	18	7	doesn't reflect actual residence - no such street of 1552 S. 10 th St	S 10 th St
65	19	2	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1905 55 th	S 5 th St
66	19	10	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 921 W. Lappan	Grant. Illegible
67	20	1	Incomplete address – street type missing	Maple St.
68	20	3	Incomplete address – street type missing	S 6 th St.
69	20	7	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1820 565 th St	S 6 th St.
70	20	8	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 1812 565 th St	S 6 th St.
71	20	9	Incomplete address – street type missing	W. Scott St
72	21	2	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 821 S. 3 rd St	S 3 rd St.
73	21	6	incomplete address - street type missing & doesn't reflect actual residence - no such street address of 2826 54 th St	S 4 th St
74	21	7	incomplete address - street directional missing & doesn't reflect actual residence - no such street address of 508 Maple St	W Maple St.
75	21	8	Incomplete address – street type missing	W. Maple St
76	21	9	Incomplete address – street type missing	W. Maple St.
77	22	1	doesn't reflect actual residence - no such street address 1439 5 th St	S 5 th St.
78	22	2	doesn't reflect actual residence - no	S 5 th St.

			such street Address 14395 5st	
79	22	4	doesn't reflect actual residence - no such street Address1961 55 st	S 5 th St.